

# Exhibit 2

## *Timeline of unfulfilled promises*

pretrial hearing April 22, 2025

Tuesday, April 22, 2025

docket call pretrial hearing

1 day after pretrial hearing

Wednesday, April 23, 2025

Dedmon's attorneys arrive home to Dallas

7 days after pretrial hearing

Tuesday, April 29, 2025

Dedmon's lead attorney sends a 1 page letter on 3 outstanding discovery issues and explains that there was a delay due to medical emergency toward the end of the prior week. *See* Exh. 1.

8 days after pretrial hearing

Wednesday, April 30, 2025

Dedmon's lead attorney sends a 3½ page letter, much of which is image screen shots of a prior email agreement and a court-filed agreement, on 2 additional discovery issues including prior defense agreement for Dedmon to conduct depositions once documents were provided. *See* Exh. 1.

9 days after pretrial hearing

Thursday, May 1, 2025

Dedmon's lead attorney sends a 1½ page letter explaining further the same issues outlined in the prior letter. *See* Exh. 1.

9 days after pretrial hearing

Thursday, May 1, 2025

Dedmon's lead attorney sends a 2½ page letter on an additional topic of dispute on discovery. *See* Exh. 1.

10 days after pretrial hearing

Friday, May 2, 2025 Joint Status Report

Quotes from Joint Status Report:

*Shell will start providing supplemental discovery to Dedmon on May 7, 2025.*

*Dedmon has communicated what he believes to be the remaining discovery issues. Shell will respond and provide its position(s) regarding what Dedmon has communicated on or before May 13, 2025.*

15 days after pretrial hearing

Wednesday, May 7, 2025

Shell provides light production that is largely unresponsive to discovery disputes or duplicative. Specifically, Shell provides some IRS Forms W-2 for some team members, but not the requested discovery. For example, Shell does not produce any information at all for the (1) only other black inside salesperson on the same team with Dedmon or (2) the white female to whom Shell offered the same job as Dedmon at a higher job grade and pay and who later joined the same inside sales team. Those are just examples of what Shell does not provide.

21 days after pretrial hearing

Tuesday, May 13, 2025

Shell emails this [next page]:

Amy, we are still in the process of reviewing your multiple letters regarding discovery but can provide the following update:

- Defendants are working to collect Rucker's and Lily's compensation information and will supplement with relevant records for time periods when they worked in the same group with Dedmon.
- We have produced some additional compensation information for certain of the individuals alleged to be comparators and will be supplementing with more information to fill in the gaps for missing time periods.
- Defendants are searching for alleged records related to Meredith Lilly from 2014; I will provide an update on whether the search has been exhausted without locating any documents or whether Shell has located responsive documents, which we will produce.
- Attached is the email is supplemental information identifying job grad classifications for certain individuals for the period 2014 to 2024. We will be providing additional supplementation for other individuals, but I wanted to provide this to you in the meantime.
- Regarding your fourth discovery letter (sent on May 2, 2025), I believe we have previously addressed our position on those topics during phone conferences and/or in our March 11, 2024 correspondence to you. For example, we stand on our objections to producing records related to other individuals, including Sean Matthews and Luis Lugo.
- I am awaiting an update regarding additional searches for any trace of a report related to Rangan's 2014 complaint. So far, Shell has not located anything beyond what we have produced. I will confirm whether additional searching turns up anything.

Marlene

Marlene C. Williams | Ogletree Deakins

One Allen Center, 500 Dallas Street, Suite 2100 | Houston, TX 77002 | Telephone: 713-655-5769

[marlene.williams@ogletree.com](mailto:marlene.williams@ogletree.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

Shell production that day was a 1-page partial chart of certain names and job grades, with zero underlying data on which the chart was based. Even that chart was otherwise incomplete as to all team members, relevant time frames, and specific dates. Shell provides nothing else.

23 days after pretrial hearing

Thursday, May 15, 2025

Dedmon's lead counsel rejects a request to extend time to supplement beyond an additional week.

Quotes from Joint Status Report:

*Shell has additional supplemental production it will provide to Dedmon on or before May 23, 2025.*

*Dedmon has communicated what he believes to be the remaining discovery issues. Shell responded to some of those issues on May 13, 2025. Shell needs additional time to respond to the remaining issues once additional supplemental production is provided to Dedmon next week.*

31 days after pretrial hearing

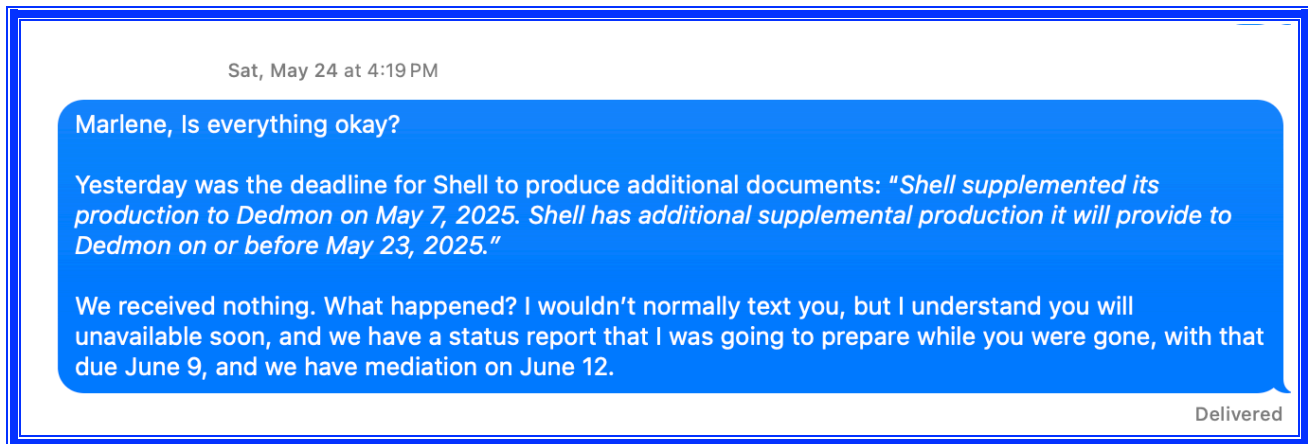
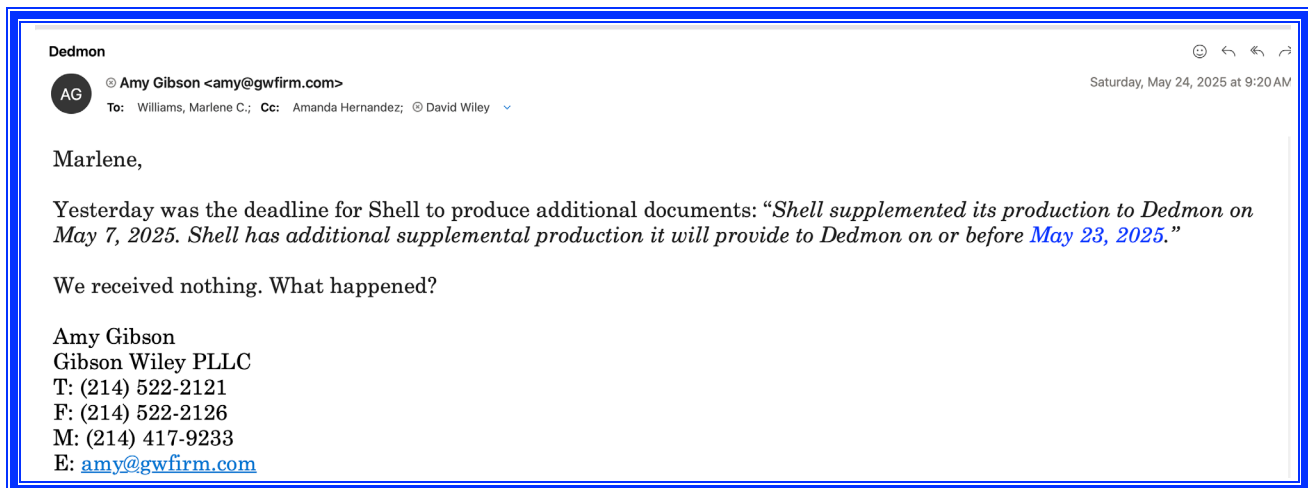
Friday, May 23, 2025

Shell blows agreed and filed deadline to supplement.

32 days after pretrial hearing

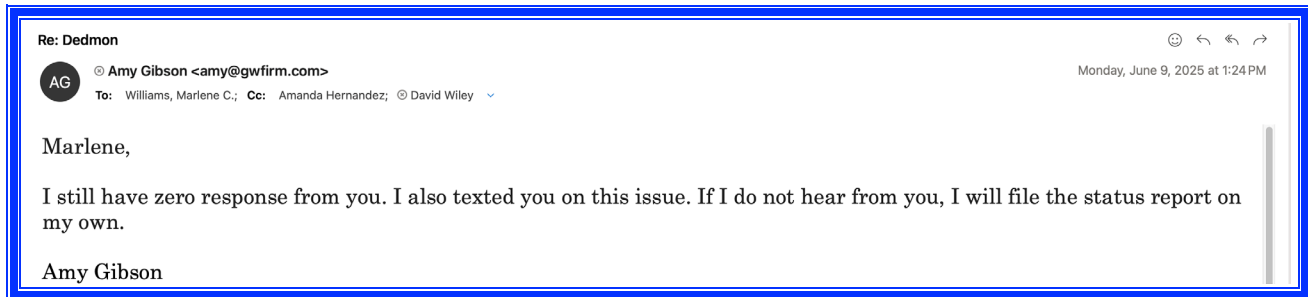
Saturday, May 24, 2025

Dedmon's lead attorney emails and texts Shell lead counsel about the blown deadline:

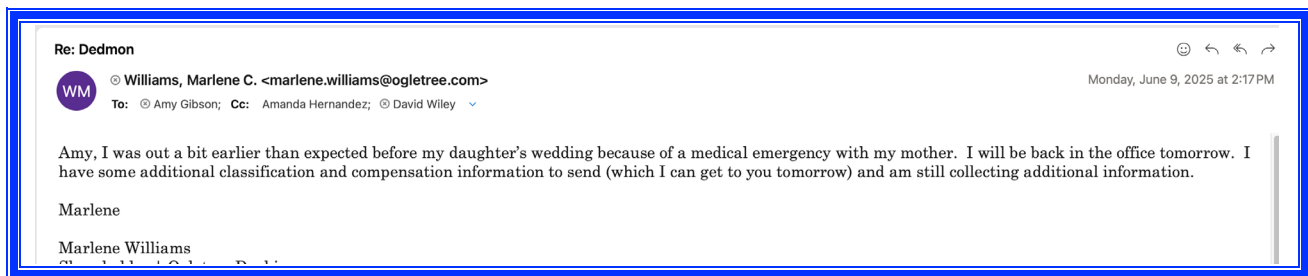


45 days after pretrial hearing  
Monday, June 9, 2025

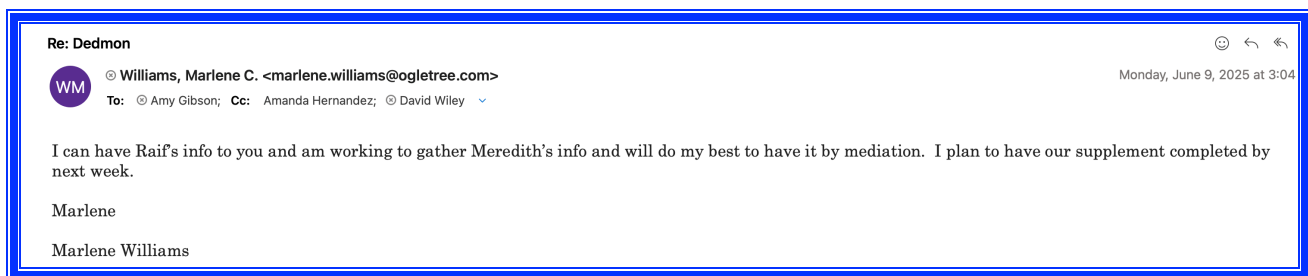
A joint status report is due, and Dedmon's lead counsel emails this:



For the first time, Shell lead counsel claims a family medical issue:



Shell also promises Raif Rucker data [only other black team member] before June 12 mediation [which it never provided]:



### 43 days after pretrial hearing

June 9, 2025 joint status report

Quotes from Joint Status Report:

*Shell supplemented its production to Dedmon on May 7, 2025. Shell had additional supplemental production it agreed to provide to Dedmon on or before May 23, 2025. Shell was not able to meet that deadline due to a medical emergency for a family member. But Shell has agreed to complete all supplemental production on or before June 13, 2025.*

*Dedmon previously communicated what he believes to be the remaining discovery issues. Shell responded to some of those issues on May 13, 2025. Shell continues to need additional time to respond to the remaining issues once additional supplemental production is provided to Dedmon next week.*

### 52 days after pretrial hearing

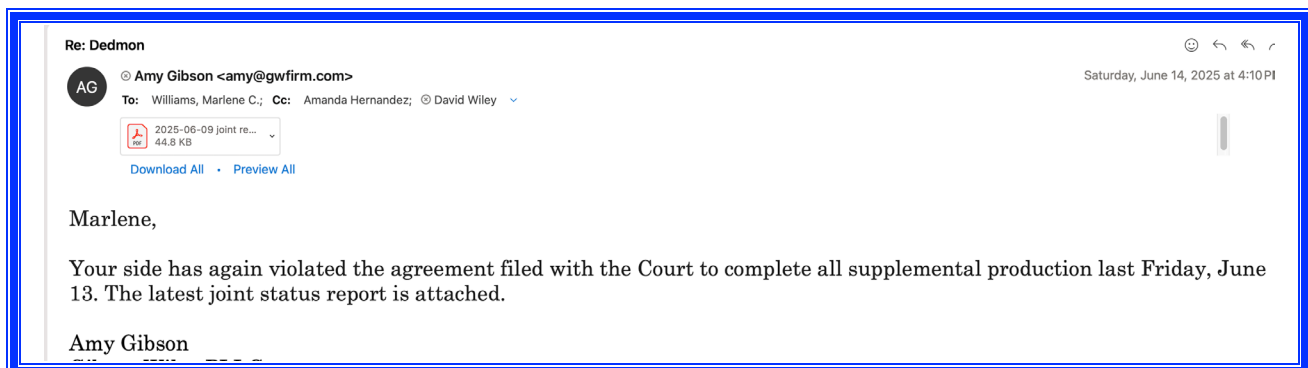
Friday, June 13, 2025

Shell blows its agreed and filed June 13, 2025 deadline to complete supplemental production. Shell also has yet to respond, as agreed, to the remaining discovery issues outlined in the April 2025 letters.

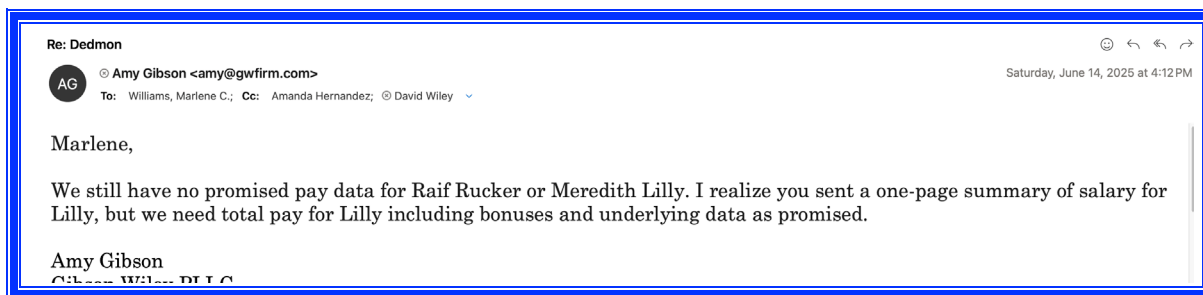
### 53 days after pretrial hearing

Saturday, June 14, 2025

Dedmon's lead attorney emails Shell lead counsel about the blown deadline:



And this:



55 days after pretrial hearing

Tuesday, June 16, 2025

Shell provides some light discovery that, once again, does not remotely match the promises it made. Dedmon's lead attorney points this out for production on June 16, 2025:

